

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

BERNADETTE HIGHTOWER, LATERSHIA  
JONES, GEORGE DEAN, and BRUCE MARK  
WOODRUFF, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

RECEIVABLES PERFORMANCE  
MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
DISMISSAL/SETTLEMENT  
PAPERWORK**

**NOTE ON MOTION CALENDAR:  
July 9, 2024**

**I. STIPULATION**

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time to file Dismissal/Settlement paperwork, and state as follows:

1           1.       On April 24, 2024, the Parties notified the Court that a resolution has been  
2 reached in this matter.

3           2.       On April 24, 2024, the Court terminated all pending deadlines and ordered  
4 Dismissal/Settlement paperwork to be filed by June 10, 2024. ECF No. 59.

5           3.       On June 10, 2024, the Parties moved the Court for an additional 30 days to  
6 present their proposed dismissal/settlement paperwork to the Court, which the Court granted on  
7 June 11, 2024. *See* ECF No. 62.

8           4.       While the Parties have nearly completed the work necessary to submit their  
9 settlement papers to the Court, they continue to finalize the documents necessary to file their  
10 Motion for Preliminary Approval, including several declarations that Plaintiffs intend to file in  
11 support of their Motion.  
12

13           5.       The Parties agree and believe that an additional 7 days would assist the Parties in  
14 finalizing the documents they need to present a full and helpful record to the Court, and intend  
15 for this to be the last such extension they seek related to this deadline.  
16

17           6.       In light of the above, the Parties stipulate and agree that good cause exists for an  
18 extension as stipulated herein.

19           7.       Considering the above and subject to Court approval, the Parties stipulate and ask  
20 that the Court order that they shall have an extension of time up to and including July 17, 2024 to  
21 file Settlement/Dismissal paperwork.  
22

23           WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that  
24 the Parties be granted an extension as stipulated and agreed herein.

25           IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 9th day of July,  
26 2024.

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**ORDER**

It is so ORDERED:

The Parties shall file Dismissal/Settlement paperwork on or before July 17, 2024.

DATED this 15<sup>th</sup> day of July, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE